

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

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IVAN NIBUR, LAWRENCE ROSS, ) Civil Action No. 15-cv-00634-SLP  
JASE LUNA, MATTHEW )  
WILLENBUCHER, and the DUANE & ) **CLASS ACTION**  
VIRGINIA LANIER TRUST, )  
Individually and On Behalf of All Others )  
Similarly Situated, ) **JOINT MOTION FOR ENTRY OF**  
Plaintiffs, ) **AN AGREED PROTECTIVE**  
v. ) **ORDER**  
SANDRIDGE MISSISSIPPIAN TRUST )  
I, SANDRIDGE MISSISSIPPIAN )  
TRUST II, TOM L. WARD, JAMES D. )  
BENNETT, MATTHEW K. GRUBB, )  
RANDALL D. COOLEY, JIM J. )  
BREWER, EVERETT R. DOBSON, )  
WILLIAM A. GILLILAND, DANIEL )  
W. JORDAN, ROY T. OLIVER, JR., )  
JEFFREY S. SEROTA, D. DWIGHT )  
SCOTT, RAYMOND JAMES & )  
ASSOCIATES, INC., MORGAN )  
STANLEY & CO. LLC (F/K/A )  
MORGAN STANLEY & CO INC., )  
MERRILL LYNCH, PIERCE, FENNER )  
& SMITH, INC., CITIGROUP GLOBAL )  
MARKETS INC., and RBC CAPITAL )  
MARKETS, LLC, )  
Defendants. )  
SANDRIDGE ENERGY, INC., )  
Nominal Defendant.

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Pursuant to Federal Rule of Civil Procedure 26, Defendants SandRidge Mississippian Trust I, James D. Bennett, Matthew K. Grubb, and Tom L. Ward, together with nominal defendant SandRidge Energy, Inc. (collectively, “Defendants”) and Lead Plaintiffs Ivan Nibur, Jase Luna, Matthew Willenbucher, and the Duane & Virginia Lanier Trust (collectively, “Plaintiffs” and together with Defendants, the “Parties”) respectfully move the Court for entry of the [Proposed] Stipulated Protective Order filed contemporaneously herewith. The Parties agree that certain documents and information have been and may be sought or produced in this action, by and between the Parties or third parties, that relate to trade secrets, confidential business and personal information, and other kinds of sensitive information—as defined in the [Proposed] Stipulated Protective Order—which the producing party deems confidential. A protective order is necessary to preserve the confidentiality of such information. Accordingly, and for good cause, the Parties respectfully request that the Court enter the [Proposed] Stipulated Protective Order.

Dated: March 29, 2018

Respectfully submitted,

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